



August 25, 2004

Mr. Stephen I. Morse  
Assistant Executive Officer  
San Francisco Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, California 94612

Re: Remedial Action Plan Addendum  
301 Industrial Way  
San Carlos, California  
*Project No.: 1100.03*

Dear Mr. Morse:

Northgate Environmental Management, Inc. (Northgate) is pleased to present this addendum to our June 16, 2004 *Remedial Action Plan, 301 Industrial Way, San Carlos, California*. This addendum has been prepared to address issues discussed with you during the August 11, 2004 meeting regarding the Remedial Action Plan (RAP). The additional information presented includes the following topics:

- Overview of the proposed remedial action process;
- Decision tree for the proposed investigation and remediation activities;
- Confirmation sampling protocols;
- Proposed approach for removal and investigation of underground utilities;
- Proposed approach for the post-remediation risk assessment;
- Post-remediation contingency planning; and
- Proposed schedule for Regional Water Quality Control Board (RWQCB) communications.

Each of these topics is addressed in detail below.

### **Overview of the Proposed Remedial Action Process**

The proposed remedial action process will begin with the shutdown of the current facility operating at 301 Industrial Road. The facility is currently owned and operated by Communications & Power Industries (CPI). CPI will be responsible for closing down operations, which includes removal of all equipment and hazardous materials stored on site.

CPI will also decontaminate and/or dispose of hazardous building materials/piping (other than to be performed by 301 Industrial LLC as described below). The San Mateo County Department of Environmental Health will oversee this work. Any soil or groundwater remediation required for such closures will be performed under the direction of the RWQCB. Once CPI has completed its shutdown and vacated the facility, only major structures will remain on site. CPI is expected to complete its closure process and vacate the site in 30 months or less.

Once CPI has vacated the site, 301 Industrial LLC will then clear the buildings and structures of asbestos containing materials (ACMs) and other remaining hazardous materials (e.g., mercury switches, fluorescent light tubes and ballasts, etc.). During this time, site features will be surveyed, as necessary, to provide an accurate site map for future sampling and remediation activities. The buildings will then be demolished. All foundations and surface-grade structures will also be removed. The parking area at the southern/southeastern area of the site will likely be retained at this time as a staging area, but will later be removed. This process is anticipated to require approximately 6 months. Approximately 60 days before commencement of demolition activities at the site, 301 Industrial LLC will submit a Field Sampling Plan (FSP) and Health and Safety Plan (HSP) to the RWQCB for review and approval.

After the site areas are cleared of buildings and structures, all of the known contaminated soil and groundwater will be remediated. It is anticipated that some overlap will occur between work on different areas of the site. The order in which areas of the site will be addressed depends on logistical considerations to be identified in the field. Waste soil and water requiring off-site disposal will be temporarily stored on-site and hauled away incrementally, although the number of waste-hauling events will be scheduled to reduce the impact on local traffic. This process is anticipated to require approximately 14 months.

Once remedial activities have been completed, all contractors and equipment will be demobilized and, following RWQCB approval, areas of the site may be rough graded in anticipation of future construction activities.

### **Decision Tree for the Proposed Investigation and Remediation Activities**

Figure 1 incorporates the complete investigation and remediation decision tree process.

### **Confirmation Sampling Protocols**

The confirmation sampling protocols are also shown in the attached investigation and remediation decision tree process figure (Figure 1). Additional information regarding confirmation sampling protocols will be presented in the FSP, which will include both a Sampling and Analysis Plan (SAP) and a Quality Assurance Project Plan (QAPP). All data screened against remedial goals to confirm site cleanup will be produced by a certified mobile and/or fixed laboratory.



## **Proposed Approach for Removal and Investigation of Underground Utilities**

All underground utilities on site will be identified, closed, and removed during the investigation and remediation process by 301 Industrial LLC. In addition, all backfill surrounding the utilities will also be removed. As utilities are removed, the trenches will be inspected for potential contamination issues. If a utility passes through a remediation zone or shows signs of potential contamination, the utility trench and related backfill will be handled and investigated per the remedial approach discussed in Section 5 of the RAP.

## **Proposed Approach for the Post-Remediation Risk Assessment**

Once remediation of the site has been completed, a human health risk assessment (HHRA) will be performed for the entire site by qualified and experienced risk assessment professionals. This HHRA will be performed based upon data that reflects the then current conditions at the site (*viz.* confirmation samples of soil, soil gas, and groundwater representing media that have not been removed). The HHRA will be conducted in accordance with the *Risk Assessment Guidance for Superfund Human Health Evaluation Manual* (EPA/540/1-89/002) considering a scenario for unrestricted use. It will include both an assessment of current site conditions and an assessment of future site conditions once the site has been redeveloped. Prior to preparing the HHRA, the detailed scope of the assessment will be discussed with the RWQCB in a meeting once remedial activities are largely completed.

## **Post-Remediation Contingency Planning**

Although it is not anticipated, given the extensive historic research and field sampling that has been completed, there is a small possibility that once remedial activities are completed at the site and the RWQCB has issued a No Further Action letter, previously unidentified area(s) of contamination could be discovered, especially during the construction phase which will immediately follow remediation. If this occurs, construction work in the immediate vicinity of the potentially affected area will be halted as soon as the potential contamination is identified and the area will be investigated and remediated consistent with the RAP. This is defined as “contingency work.” During any contingency work, the RWQCB will receive periodic updates; a completion report for the contingency area will be submitted to and approved by the RWQCB. In addition, if contamination in the contingency area has the potential to impact the HHRA, an addendum to the HHRA will be prepared to address the affected area.

## **Proposed Schedule for RWQCB Communications**

During the current facility closure process, quarterly updates will be provided to the RWQCB. Once the facility is ready for commencement of building demolition, a schedule with milestones will be submitted to the RWQCB. This schedule will serve as a launching point for establishing a communication schedule and protocols for the investigation and remediation phase of the project.



## CLOSING

We hope this addendum has provided sufficient clarification on the issues discussed at the August 10, 2004, meeting. If you should have any questions or require additional information, please feel free to contact either of the undersigned.

Sincerely,

**Northgate Environmental Management, Inc.**



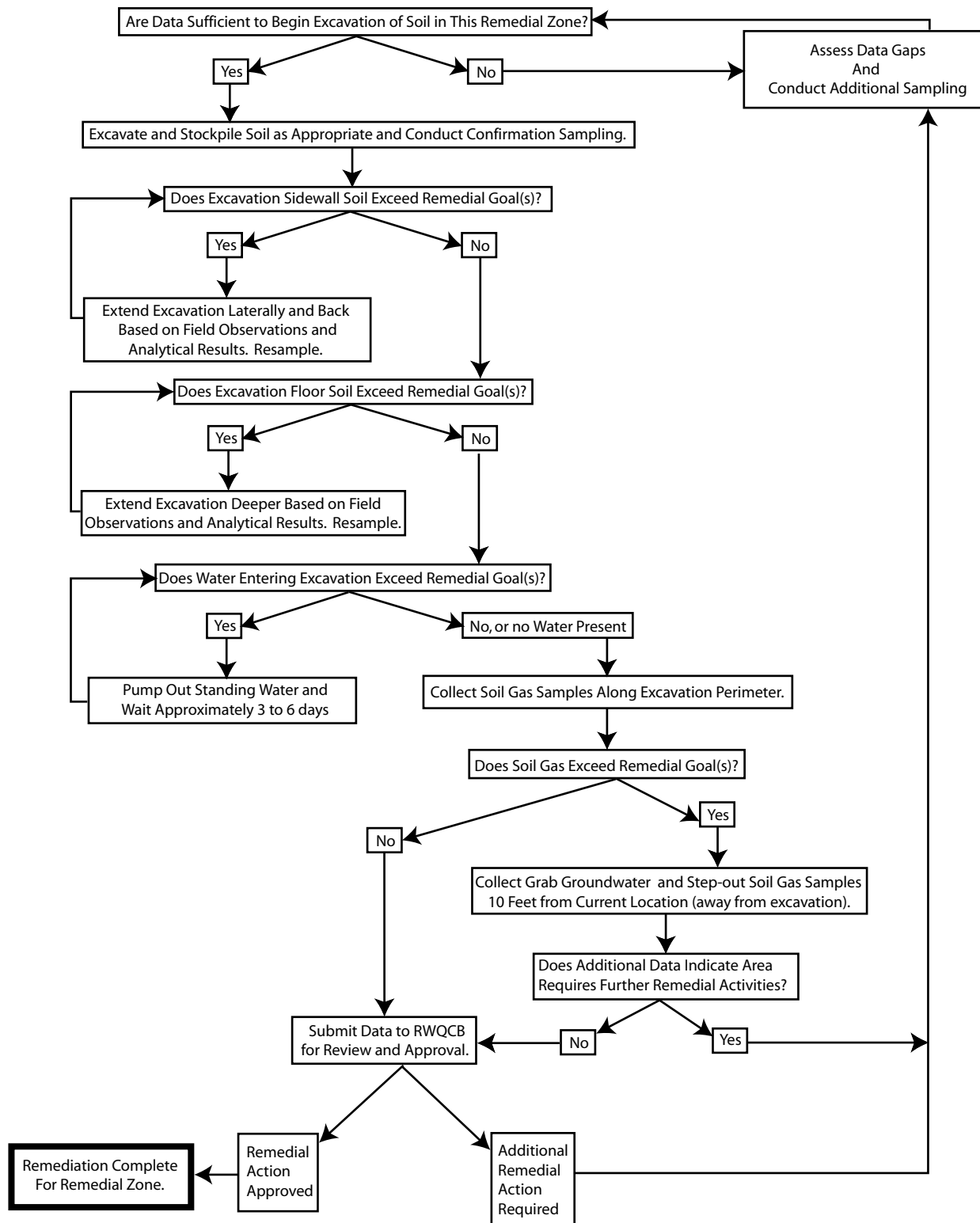
Alan Leavitt, P.E.  
Principal



James Schwartz, R.G.  
Senior Project Geologist

Attachments  
Figure 1 – Decision Tree





**FIGURE 1  
DECISION TREE**

Remedial Action Plan Addendum  
301 Industrial Way  
Palo Alto, California  
August 2004